Ashton J. Hyde (A13248)
YOUNKER HYDE MACFARLANE,
PLLC

257 East 200 South, Suite 1080 Salt Lake City, UT 84111 Telephone: (801) 335-6467 Facsimile: (801) 335-6478 ashton@yhmlaw.com

Fax: (612) 336-2940 bbliechner@chestnutcambronne.com pkrzeski@chestnutcambronne.com *Pro Hac Vice Admitted

CHESTNUT CAMBRONNE PA

100 Washington Avenue South, Suite 1700

Joshua Sanford *
(AR Bar No. 2001037)

SANFORD LAW FIRM, PLLC
Kirkpatrick Plaza
10800 Financial Centre Parkway,
Ste. 510
Little Rock, AR 72211
Telephone: (501) 221-0088
josh@sanfordlawfirm.com

Danielle L. Perry*
(DC Bar No. 1034960)

MASON LLP
5335 Wisconsin Ave. NW, Ste. 640

Bryan L. Bleichner*

(MN Bar No. 0326689) Philip J. Krzeski*

(MN Bar No. 0403291)

Minneapolis, MN 55401 Phone: (612) 339-7300

Washington, DC 20015 Phone: 202-429-2290 dperry@masonllp.com

Attorneys for Plaintiffs and Putative Class

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

JASON RASMUSSEN, et al.,

on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

UINTAH BASIN HEALTHCARE,

Defendant.

Case No. 2:23-cv-00322-CMR

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION TO FILE CONSOLIDATED AMENDED COMPLAINT

Plaintiffs Jason Rasmussen, Mindy Rasmussen, Mandy Keasler, on behalf of herself and

her minor child, A.K., and Christian Miller ("Rasmussen Plaintiffs"), individually and on behalf

of all others similarly situated, hereby seek an extension to file their consolidated amended

complaint in order to move to consolidate two additional related cases (1) Halton, et al., v. Uintah

Basin Healthcare, Case No. 2:23-cv-00373-JCB (D. Ut.) ("Halton") and (2) Hyatt v. Uintah Basin

Medical Center, Case No. 2:23-cv-00377-CMR (D. Ut.) ("Hyatt") into the present action:

Rasmussen, et al., v. Uintah Basin Healthcare, Case No. 2:23-cv-00322 (D. Ut.). The Rasmussen

Plaintiffs seek an extension of fourteen (14) days from the date the Court rules on Plaintiffs'

Second Motion to Consolidate Related Cases to file the Consolidated Amended Complaint. This

extension will enable Plaintiffs to file a Consolidated Amended Complaint that addresses all five

related cases pending against Defendant in the United States District Court for the District of Utah.

Plaintiffs' counsel certifies this request is for not purposes of undue delay and will not postpone

any existing trial schedule. Moreover, Plaintiffs' counsel avers this is the first requested extension

sought.

Counsel for the Rasmussen Plaintiffs conferred with Counsel in the Halton and Hyatt

maters, as well as Defendant's Counsel, who indicated they do not oppose this extension.

Dated: July 27, 2023

Respectfully submitted,

/s/ Bryan L. Bleichner

Bryan L. Bleichner (MN BAR #0326689)*

Philip J. Krzeski (OH BAR #0095713)*

CHESTNUT CAMBRONNE PA

100 Washington Avenue South, Suite 1700

Minneapolis, MN 55401

2

Phone: (612) 339-7300 Fax: (612) 336-2940

bbliechner@chestnutcambronne.com pkrzeski@chestnutcambronne.com

Mason A. Barney* Tyler J. Bean*

SIRI & GLIMSTAD LLP

745 Fifth Avenue, Suite 500 New York, New York 10151 Tel: (212) 532-1091 mbarney@sirillp.com tbean@sirillp.com

Danielle L. Perry * **MASON LLP**

5335 Wisconsin Avenue NW, Suite 640 Washington, DC 20015 Tel: (202) 429-2290 dperry@masonllp.com

Interim Co-Lead Counsel

Ashton J. Hyde (A13248)
YOUNKER HYDE MACFARLANE,
PLLC

257 East 200 South, Suite 1080 Salt Lake City, UT 84111 Telephone: (801) 335-6467 Facsimile: (801) 335-6478 ashton@yhmlaw.com

Josh Sanford (AR Bar No. 2001037)*

SANFORD LAW FIRM, PLLC

10800 Financial Centre, Pkwy., Ste. 510 Little Rock, Arkansas 72211 Phone: (501) 787-2040 josh@sanfordlaw.com

Jason R. Hull

MARSHALL OLSON & HULL PC

10 EXCHANGE PL STE 350

SALT LAKE CITY, UT 84111

(801)456-7655 jhull@mohtrial.com

Jennifer F. Parrish
Yevgen Kovalov
MAGLEBY CATAXINOS &
GREENWOOD
141 W PIERPONT AVE
SALT LAKE CITY, UT 84101
801-359-9000
Fax: 801-359-9011
parrish@mcgiplaw.com
kovalov@mcgiplaw.com

Counsel for Rasmussen, et al., Plaintiffs and the Putative Class

*Admitted pro hac vice

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of July 2023, I caused to be served, via the court's E-filing system or via email, a true and correct copy of **PLAINTIFFS' UNOPPOSED**MOTION FOR EXTENSION TO FILE CONSOLIDATED AMENDED COMPLAINT on Defendant's Counsel through the Court's ECF system.

/s/ Bryan L. Bleichner
Bryan L. Bleichner (MN BAR #0326689)*